

EXHIBIT B

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September 14, 2007

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Jeffrey A. Worthe, Esquire
Worthe, Hanson & Worthe
The Xerox Centre
1851 East First Street, Ninth Floor
Santa Ana, CA 92705

Re: All Nippon Airways Company, Ltd. v. United Air Lines, Inc
United States District Court for the Northern District of California
Case No. C 07 3422 EDL
C & F Ref.: MST/05901

Dear Gentlemen:

I am writing in response to Mr. Torpey's letter dated September 12, 2007 and the deposition notices attached thereto. As I informed you in my emails of August 21, 2007 and August 28, 2007 and my letters of August 30, 2007 and September 7, 2007, at least two, if not all three, members of ANA's flight crew will be available for deposition on the dates you requested, November 27 through November 29. We will let you know closer to that time, when the flight crews' schedules become fixed, whether we will be able to produce all three witnesses. If one of these three witnesses is not available, we will let you know and provide alternate dates as soon as possible.

Further to my letter of August 30, 2007, and your request for a "PMK," no such witness will be provided unless you can explain how the Ground Handling Agreement referred to in and attached to your Counter-Complaint could have any relevance to any issue in this case and why any question regarding this agreement cannot be answered through interrogatories or admissions.



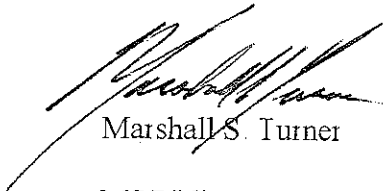
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Attached please find deposition notices for United's flight crew, ramp controller, and tug driver. We have requested that United provide dates for these depositions on multiple occasions and no dates have been provided. Accordingly, we have selected our own dates, which are reflected in the attached notices. Please advise if the United witnesses are unavailable on these dates and on what dates they will be available and we will be happy to reschedule their depositions for mutually convenient dates at a location convenient to the witnesses.

Thank you for your anticipated cooperation in this regard.

Sincerely yours,



Marshall S. Turner

MSI/hlj

Enclosure

cc: Walt Kopas
Frank Silane
Scott Cunningham

CONDON & FORSYTH LLP

New York
Los Angeles

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Date: September 18, 2007	No. of Pages including fax cover sheet: 23
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4.	Walter Kopas	United States Aviation Underwriters, Inc.	212-349-8226	212-859-3814

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